

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

HUGHES RIVER FM, LLC,
a Delaware limited liability company,

Plaintiff,

vs.

XIMALAYA, INC.,
a Cayman Islands corporation,
YU JIANJUN, *an individual,*
SEAMAN YU, *an individual,*
XIAOYU CHEN, *an individual,*
LI HAIBO, *an individual,*
and TENCENT MUSIC ENTERTAINMENT
GROUP, INC., *a Cayman Islands*
corporation,

Defendants.

Civil Case No. 1:25-cv-06217

Hon. Edmond E. Chang

**MOTION FOR LEAVE TO SUBSTITUTE
COUNSEL AND WITHDRAW APPEARANCE**

Defendants Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [sic] Chen and Li Haibo (collectively, the “Individual Defendants”), pursuant to Local Rule 83.17, respectfully move that leave be granted for Timothy J. McCarthy, Todd Gale, Mark J. Makoski, and Lu W. Harmening of the law firm of Dykema Gossett PLLC to enter their substituted appearances on behalf of the Individual Defendants in place of counsel of record Vincent Filardo, Junior, Andrew Jacob Sklar and Yi He of the law firm King & Wood Mallesons LLP and Kenneth J. Vanko of the law firm Clingen, Callow & McLean, LLC, and that Mr. Filardo, Mr. Sklar, Ms. He and Mr. Vanko be granted leave to

withdraw their appearances on behalf of the Individual Defendants, while maintaining their appearances on behalf of Defendant Ximalaya, Inc.

In support of their Motion, the Individual Defendants state that:

1. The Individual Defendants have requested that Timothy J. McCarthy, Todd Gale, Mark J. Makoski, and Lu W. Harmening of the law firm of Dykema Gossett PLLC substitute their appearances in place of current counsel.

2. Mr. Gale is an active member of the Trial Bar, and Ms. Harmening is an active member of the General Bar, of the United States District Court for the Northern District of Illinois. They will file appearances in this case forthwith should the Court choose to grant this Motion.

3. Mr. McCarthy and Mr. Makoski are not members of the Bar of the United States District Court for the Northern District of Illinois, but they will submit their applications for admission and file appearances in this case forthwith should the Court choose to grant this Motion.

4. Mr. Filardo, Mr. Sklar, Ms. He and Mr. Vanko will remain counsel for defendant Ximalaya, Inc. Pursuant to LR 83.17, as a member of this Court's Trial Bar, Kenneth Vanko respectfully moves for leave to withdraw as counsel for the Individual Defendants, while maintaining his appearance on behalf of Defendant Ximalaya, Inc.

5. This motion will not cause any delay to the schedule of this Court or any prejudice to plaintiff.

WHEREFORE, Defendants Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [sic] Chen and Li Haibo respectfully request leave of Court to permit the substitution and withdrawal of the attorneys identified above.

Dated: August 14, 2025

Respectfully submitted,

YU Jianjun, SEAMAN YU (duplicate of Yu Jianjun), Yuxin Chen, and Haibo Li

s/ Kenneth J. Vanko

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Counsel for Defendants Yu Jianjun, Seaman Yu (duplicate of Yu Jianjun), Xiaoyu [sic] Chen, and Li Haibo

CERTIFICATE OF SERVICE

I hereby certify that on August 14, 2025, I electronically filed the foregoing **Motion for Leave to Substitute Counsel and Withdraw Appearances** with the Clerk of the Court using the ECF system, which sent electronic notification to all parties of record.

s/ Kenneth J. Vanko